



Barbara Schuster

05/25/2004 08:27 AM

To: Jesus.Diaz@dep.state.fl.us

cc:

Subject: Tender Touch Drycleaner SI WP Comments

Jesus,

Hi! Here are EPA comments on the Work Plan:

1. The Site description should identify the neighboring adjacent properties in each direction.
2. Do operating drycleaners ever get looked at by the RCRA program?
3. The Investigational History does not mention the PA done in 1998. This is something that should be summarized in the site history.
4. Could we incorporate GPSing the wells as well so that we have surveyed locations for them?
5. The DQOs should be specific to what criteria - reference the Florida Statute, SCTLs, Federal MCLs, or what?
6. No where in the plan does it talk about potential nearby private wells that might be prudent to include for sampling. Does it say where the closest municipal wells are? Things should be included because they could impact the objectives. IF the groundwater flow direction is known, surficial or floridan, it should be stated, again because this is important information that may drive sampling locations. Are there any plans to contact the health department to see if they do any private wells sampling.
7. Sampling is limited to onsite. This makes sense unless your only field detection is at the southern boundary sampling location. I think we should allow for the potential for offsite locations, maybe in the public right of way, if necessary. The offsite sampling may at least allow you to make the determination that onsite contamination is not moving offsite.

Thanks for letting me take a look at it.

Barbara



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